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September 16, 2024

VIA ECF

Magistrate Peggy Kuo, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: State Farm Mut. Auto. Ins. Co., et al. v. Metro Pain Specialists P.C., et al.
Case No.: 1:21-cv-05523-MKB-PK

Dear Magistrate Kuo:

As Your Honor may recall, this firm represents defendants Yan Moshe, Hackensack Specialty ASC LLC, Integrated Specialty ASC LLC, Reuven Alon, Columbus Imaging Center LLC, Medaid Radiology LLC, SCOB LLC, Citimed Surgery Center LLC, NJMHC LLC, Star Solutions Services, LLC, Beshert Corp., Nizar Kifaieh, M.D., and Premier Anesthesia Associates PA (collectively “Defendants”) in the above referenced matter. I am writing with regard to Defendants’ deadline to complete their ESI production.

On July 25 , 2024, Your Honor entered an Order granting Defendants’ request to extend the time to complete the ESI production (as set forth in Docket Entry 600). As such, Defendants were to complete the ESI production by September 15, 2024 and provide a privilege log by September 30, 2024. Since that time, this office has continued its review and ESI production. Multiple productions have been made, and the review and production continues on a rolling basis.

While Defendants have significantly moved toward completion of their ESI production, there does remain additional documents to be reviewed and produced. After discussing Defendants’ ESI production status and remaining items to review with counsel for State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company (“State Farm” or “Plaintiffs”), Defendants request Your Honor approve the following deadline extension requests:

5 Penn Plaza, 23rd Floor
New York, New York 10001
212.896.3974

101 Eisenhower Parkway
Roseland, New Jersey 07068
973.228.5700

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- Defendants' ESI production to be completed on or before October 31, 2024;
- Defendants to provide a privilege log related to ESI production on or before November 15, 2024.

State Farm's attorneys have advised they do not oppose this request.

Thank you for Your Honor's consideration.

Respectfully submitted,

/s/ Anthony M. Juliano

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